

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE  
ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;  
UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**NOTICE OF STATEMENT OF CONCURRENCE ON RECENT MOTIONS**

1. I hereby provide this **statement of concurrence** pertaining to motions filed last night on 5-9-24, as follows:
  - a. **PLAINTIFF'S MOTION FOR LIMITED DISCOVERY PERTAINING TO DEFENDANTS' OBJECTIONS TO MOTION TO AMEND COMPLAINT**
  - b. **MOTION FOR SANCTIONS AGAINST THE DONAIS DEFENDANTS**
  - c. **MOTION FOR SANCTIONS AGAINST THE HILLIARD DEFENDANTS**
2. I sought concurrence from the defendants (on or about 4-10-24) for the **PLAINTIFF'S MOTION FOR LIMITED DISCOVERY PERTAINING TO DEFENDANTS' OBJECTIONS TO MOTION TO AMEND COMPLAINT**, but the defendants did not concur.
3. I did not recently seek concurrence from the defendants for the **MOTION FOR SANCTIONS AGAINST THE DONAIS DEFENDANTS** or the **MOTION FOR SANCTIONS AGAINST THE HILLIARD DEFENDANTS**, because due to the nature of these motions, the seeking of concurrence from the defendants is not required as it is evident that they would not concur with such motions (especially since these implicate dispositive requests). However, I did in the past indicate to the defendants my intention to file for sanctions for false or misleading statements by the defendants (i.e. on **"motion for sanctions under Rule 11 or other basis, for persistent untrue, false or misleading statements and attendant refusal to stop advancing them or refusal to correct them with the court as well as for other ethical or rule violations"**) and, although not required, I did seek concurrence from the defendants at the time on this but I, unsurprisingly, did not obtain concurrence at that time.
4. This statement of concurrence applies to the three motions filed last night on 5-9-24.

May 10, 2024

Respectfully submitted,  
/s/ Andre Bisasor  
Plaintiff Andre Bisasor

**CERTIFICATE OF SERVICE**

This filing is served to all parties of record via the e-filing system.

/s/ Andre Bisasor  
Andre Bisasor